

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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SHARON CHASE, as Administratrix of the  
Estate of NICOLE CARMEN,

Plaintiffs

-vs-

CORRECTIONAL MEDICAL CARE, INC.,  
EMRE UMAR,  
JANE DOE NUMBER ONE, the screening nurse  
for decedent, Nicole Carmen, employed by  
Correctional Medical Care, Inc., whose identity  
cannot presently be determined, JANE DOE  
NUMBER TWO, Head Nurse at the Schenectady  
County Jail, employed by Correctional Medical  
Care, Inc., whose identity cannot presently be  
determined, JOHN/JANE DOES 3-5,  
employees of Correctional Medical Care, Inc.,  
whose identities cannot presently be determined,  
COUNTY OF SCHENECTADY,  
DOMINIC A. D'AGOSTINO, JIM BARRETT,  
and JOHN/JANE DOES 6-10, employees of  
the Schenectady County Sheriff's Department  
whose identities cannot presently be determined,

Defendants.

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**DEFENDANT'S  
ANSWER TO  
CROSS-CLAIMS**

**Civil Action No.  
14-cv-0474  
DNH/TWD**

*Jury Trial Demanded*

Defendants, County of Schenectady, Dominic A. Dagostino and Jim Barrett, by and through their attorneys, Goldberg Segalla, LLP, answer and respond to the cross-claims of Defendants, Correctional Medicare Care, Inc., and Emre Umar, as follows:

1. Deny the allegations contained in paragraphs "3" and "4" of Defendants' Answer to Cross Claims.
2. Any allegation not specifically addressed above is hereby denied.

WHEREFORE, answering Defendants demand judgment dismissing the Complaint of the Plaintiff and all cross-claims herein with prejudice and on the merits and indemnification and/or contribution and a defense from Co-Defendants Correctional Medical Care, Inc. and Emre Umar, together with costs, disbursements and attorneys fees of this action.

DATED: Albany, New York  
August 21, 2014

GOLDBERG SEGALLA, LLP

By 

Jonathan M. Bernstein

Bar Roll No. 512457

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